Exhibit 3-3   6509.2 REV-5
CDBG Entitlement Program

Guide for Review of National Objective of **Low- and Moderate Income Limited Clientele**			
Name of Program Participant:			
Staff Consulted:			
Activity Name, Number and Brief Description:			
Name(s) of Reviewer(s)		**Date**	

NOTE: All questions that address requirements contain the citation for the source of the requirement (statute, regulation, NOFA, or grant agreement). If the requirement is not met, HUD must make a finding of noncompliance. All other questions (questions that do not contain the citation for the requirement) do not address requirements, but are included to assist the reviewer in understanding the participant's program more fully and/or to identify issues that, if not properly addressed, could result in deficient performance. Negative conclusions to these questions may result in a "concern" being raised, but not a **"finding."**

Instructions: Use this Exhibit for activities that are classified by the program participant as meeting the national objective of benefiting a low- and moderate-income limited clientele. One Exhibit is to be completed for each activity reviewed. If the answer to question 7 is negative, the appropriate corrective action may result in the use of another national objective exhibit, based upon the HUD reviewer's analysis.

Questions:

1.

Under what limited clientele category has the program participant classified this activity (presumed benefit, family size and income, low- and moderate-income eligibility restrictions, or nature and location)?
Describe Basis for Conclusion:

2.

a. If the activity is classified as presumed benefit, do the program participant's files have documentation showing that the activity is limited to one or a combination of the 8 population segments presumed to be low- and moderate-income by HUD: • abused children? • battered spouses? • elderly persons? • adults meeting the Bureau of the Census' Population Report's definition of "severely disabled" (current for the time period of this review)? • homeless persons? • illiterate adults? • persons living with AIDS? • migrant farm workers? [24 CFR 570.208(a)(2) and 24 CFR 570.506(b)(3)(i)]	☐ Yes	☐ No	☐ N/A

Describe Basis for Conclusion:

b. If "yes", what segment(s) of the population is/are served by the activity?

Describe Basis for Conclusion:

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3.

a. If the activity is classified under family size and income, does the program participant's files have documentation showing that at least 51% of the beneficiaries are members of a low- and moderate-income family? [24 CFR 570.208(a)(2)(i)(B) and 24 CFR 570.506(b)(3)(iii)]	☐ Yes	☐ No	☐ N/A

Describe Basis for Conclusion:

b. If the activity is classified based on income eligibility requirements that restrict it exclusively to low- and moderate-income persons, do the program participant's files have documentation to support that all persons benefiting are low- and moderate-income? [24 CFR 570.208(a)(2)(i)(C) and 24 CFR 570.506(b)(3)(iii)]	☐ Yes	☐ No	☐ N/A

Describe Basis for Conclusion:

c. If the activity was classified based on income, were the appropriate Section 8 income limits used by the program participant when checking the income of the persons served (the correct year and the correct family size)? [24 CFR 570.3, 24 CFR 208(a)(2)(i)(B) or (C), and 24 CFR 570.506(b)(3)(iii)]	☐ Yes	☐ No	☐ N/A

Describe Basis for Conclusion:

d. **[OS]** How is information on the income status of participants being requested, updated or properly assessed?

Describe Basis for Conclusion:

4.

If the activity is classified based on the nature and location of the activity, does the program participant's files have documentation to support that the beneficiaries are predominately low- and moderate-income? [24 CFR 570.208(a)(2)(i)(D) and 24 CFR 570.506(b)(3)(ii)]	☐ Yes	☐ No	☐ N/A
Describe Basis for Conclusion:			

5.

Did your inspection of the records validate the information contained in the Integrated Disbursements and Information System (IDIS) and/or the program participant's most recently-completed Consolidated Annual Performance and Evaluation Report for the activity? [24 CFR 91.525(a)(3)]	☐ Yes	☐ No	☐ N/A
Describe Basis for Conclusion:			

6.

[OS] If you inspected the facility/service, is there any evidence to indicate that this activity does not predominately or exclusively benefit low- and moderate-income persons, based upon the category of presumed benefit selected by the program participant? [24 CFR 570.208(a)(2)]	☐ Yes	☐ No	☐ N/A
Describe Basis for Conclusion:			

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7.

Is the activity properly classified as limited clientele? [24 CFR 570.208(a)(2)]	☐	☐
	Yes	**No**
Describe Basis for Conclusion:		